

EXHIBIT 20

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From: owner-googleteam@lists.susmangodfrey.com on behalf of [Mark C. Mao](#)
To: [Josef Ansorge](#); [Ryan McGee x3030](#); [Timothy Schmidt](#); [Douglas Brush](#)
Cc: [QE Brown](#); GOOGLETEAM@lists.susmangodfrey.com
Subject: Re: Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential
Date: Wednesday, February 23, 2022 8:17:34 PM

EXTERNAL Email

Mr. Ansorge. [REDACTED]

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From: Josef Ansorge <josefansorge@quinnemanuel.com>
Sent: Wednesday, February 23, 2022 5:06:21 PM
To: Mark C. Mao <mmap@BSFLLP.com>; Ryan McGee x3030 <rmcgee@forthepeople.com>; Timothy Schmidt <timothy.schmidt@accelconsulting.llc>; Douglas Brush <douglas.brush@accelconsulting.llc>
Cc: QE Brown <qebrown@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com
Subject: Re: Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential

Mr. Mao:

Our understanding is that the log source [REDACTED] has a field named [REDACTED].

As we have explained before, [REDACTED] lists the largest 100 fields in a given [REDACTED] log. If the field [REDACTED] is not one of the largest 100 fields, then it won't be listed in [REDACTED].

Please let us know what time tomorrow afternoon you would like to meet and confer.

Best,

Josef Ansorge
Of Counsel,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Mark C. Mao <mcao@BSFLLP.com>

Sent: Wednesday, February 23, 2022 7:18:43 PM

To: Ryan McGee x3030 <rmcgee@forthepeople.com>; Timothy Schmidt <timothy.schmidt@accelconsulting.llc>; Douglas Brush <douglas.brush@accelconsulting.llc>

Cc: QE Brown <qebrown@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com <GOOGLETEAM@lists.susmangodfrey.com>

Subject: RE: Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential

[EXTERNAL EMAIL from mcao@bsfllp.com]

Mr. Ansorge: In addition to the question below, I am also open tomorrow and Friday to meet and confer with you as requested by the Special Master.

Special Master Brush and Mr. Schmidt – After Mr. Ansorge gives me a time to meet and confer, I will send out proposals for another meeting with you, prior to the next regular scheduled meeting. Thank you.

From: Mark C. Mao

Sent: Wednesday, February 23, 2022 2:01 PM

To: Ryan McGee x3030 <rmcgee@forthepeople.com>; Timothy Schmidt <timothy.schmidt@accelconsulting.llc>; Douglas Brush <douglas.brush@accelconsulting.llc>

Cc: QE Brown <qebrown@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com

Subject: RE: Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential

Mr. Ansorge:

I looked at the [REDACTED] log you identified, and there is no field for the [REDACTED] bit. We looked at every field.

Which field from this schema would that bit be located? Please let us know that quickly.

Thank you in advance.

From: Ryan McGee x3030 <rmcgee@forthepeople.com>

Sent: Tuesday, February 22, 2022 5:11 PM

To: Timothy Schmidt <timothy.schmidt@accelconsulting.llc>; Douglas Brush <douglas.brush@accelconsulting.llc>

Cc: QE Brown <gebrown@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com; Mark C. Mao <mmao@BSFLLP.com>

Subject: RE: Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential

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Dear Special Master Brush, Mr. Schmidt, and Counsel:

The *Brown* Plaintiffs propose the following agenda for our session:

1. Field Descriptions and Schema
 - Plaintiffs want to know when they will receive the field descriptions that the Special Master ordered on December 15, 2021 (see attached email)
 - Plaintiffs also want to know when they can expect schemas for all logs that Bert Leung used for his Incognito analysis
2. Any Withheld Information
 - Has Google limited or withheld any production of fields from the data sources, including Search and [REDACTED] bits. If so, when, which, and why?
3. [REDACTED] Bit
 - Please identify all data sources that contain or contained the [REDACTED] bit.
4. Identifiers & Data Sources
 - Are there any identifiers that Plaintiffs have submitted that do not exist in the data sources requested to be searched with those identifiers?
5. Plaintiffs' Data
 - Googled stated it would search [REDACTED] and produce the results to the Special Master for review; when can Plaintiffs expect that production?
6. Searching Historical Data (more than 8 days)
 - What has Google done to search for historical data?
7. Finishing Iterative Search 1

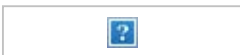
Thank you,
Ryan

Ryan McGee
Attorney
[My Bio](#)

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A: 201 N Franklin St, 7th Floor, Tampa, FL 33602



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A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

From: Timothy Schmidt <timothy.schmidt@accelconsulting.llc>

Sent: Tuesday, February 22, 2022 3:51 PM

To: QE Calhoun <qecalhoun@quinnemanuel.com>; QE Brown <qebrown@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com; Lesley Weaver <lweaver@bfalaw.com>; David Straite <dstraite@dicellolevitt.com>; jaybarnes@simmonsfirm.com; Mark C. Mao <mmao@bsfillp.com>; Sharon Cruz <scruz@dicellolevitt.com>; Ryan McGee x3030 <rmcgee@forthepeople.com>; Adam Prom <aprom@dicellolevitt.com>; Angelica Ornelas <aornelas@bfalaw.com>

Cc: Douglas Brush <douglas.brush@accelconsulting.llc>

Subject: *EXT* Brown ((20-3664) Calhoun (20-5146) v. Google - Informal Meet and Confer Conferences this Wednesday - Confidential

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All,

In light of our upcoming informal conferences tomorrow, Special Master Brush and I have discussed and continue to review your submissions.

If you have further (brief) submissions for Special Master Brush, he will be taking those only until 5:00 pm EST today to have adequate time to prepare for the sessions thoughtfully.

Please also work together (Plaintiffs and Google) in preparing agendas for the conferences. As before, Mr. Brush has asked that these agendas be joint submissions with bullet points and only the necessary technical language to support issues. These are due no later than 8:00 pm EST, today.

Thank you,
Tim Schmidt

Timothy Schmidt

Consultant

M 202.577.5302

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Accel Consulting LLC

BOULDER, CO 80301

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